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4/13/06

United States Environmental Protection Agency
Region V
POLLUTION REPORT

EPA Region 5 Records Ctr.



255735

Date: Thursday, April 13, 2006

From: Kevin Turner, OSC

Subject: POLREP #2

Clayton Chemical/RRG Soils Removal

#1 Mobile Avenue, Sauget, IL

Latitude: 38.8303

Longitude: -90.1825

POLREP No.: 2

Site #:

Reporting Period:

D.O. #:

Start Date:

Response Authority:

CERCLA

Mob Date:

12/5/2005

Response Type:

Non-Time-Critical

Completion Date:

NPL Status:

Non NPL

CERCLIS ID #:

Incident Category:

Removal Action

RCRIS ID #:

Contract #

Site Description

Please refer to POLREP #1

Current Activities

A. Situation

1. Response activities to date

- After a series of meetings with the PRP representatives and their oversight contractor, Conestoga-Rovers & Associates, Inc. (CRA), U. S. EPA requested that a Work Plan be submitted for project related removal activities. The PRP's executed the Settlement Agreement in early October, 2005. U. S. EPA received the revised project Work Plan in early October, 2005. The Administrative Order on Consent (AOC) was executed between the respondents and U. S. EPA on October 27, 2005.

- On November 16, 2005, CRA notified U. S. EPA that a removal contractor, Brandenburg Industrial Services (Brandenburg), was selected to perform tank decommissioning and soil removal activities. On December 5, 2005, the removal contractor initiated mobilization of heavy equipment resources to the site.

- 15 cubic yards of asbestos containing materials (ACM) were removed during the weeks of December 5th and December 12th, 2005.

- A chemical sweep was performed on December 5th and 6th, 2005.
- Brandenburg initiated demolition of empty above ground storage tanks on December 6, 2005.
- During the week of December 12, 2005, CRA/Brandenburg site representatives collected representative waste samples for disposal characterization at an EQ Treatment Storage Disposal Facility (TSDF).
- Initial soil investigation activities were started on January 16, 2006. A total of 45 test pits were completed by Brandenburg.
- Drum inventorying, characterization, and disposal activities for the month of January 2006 comprised:
 - ☐ A total of 119 drums had been sampled for waste characterization means.
 - ☐ A total of 273 empty drums; 131 plastic & 142 steel; were crushed and stockpile for off-site disposal.
- Brandenburg initiated access, product removal, and/or demolition of the above-ground storage tanks (ASTs) located within the facility during January 2006. A total of 64 ASTs were formerly present at the facility. To date:
 - ☐ 61 ASTs have been demolished and scrapped.
 - ☐ Product residuals have been removed and either disposed as bulk shipments or are currently drummed on-site.
 - ☐ Three (3) ASTs, containing residuals, currently remain on the site.
- Between February 3-7, 2006, a total of 75 tons of fly ash was delivered to the site for tank product solidification and disposal. Nuisance dust generated during the fly ash delivery prompted CRA/Brandenburg to utilize Bottom Ash as the solidifying agent. A total of 54 tons of bottom ash was brought on-site by the end of February 2006.
- Off-site disposal activities were initiated on February 8, 2006. The following account of materials have been transported/disposed at a Subtitle D classified landfill (Milam Landfill) or an approved scrap metal facility:
 - ☐ Sixty (60) total loads of non-hazardous waste have been transported to the Milam Landfill. These non-hazardous wastes included solidified tank residuals, ACMs, and miscellaneous site or structure debris.
 - ☐ Eleven (11) total loads of scrap metal have been transported and disposed at the Grossman Iron & Steel of St. Louis.
- Structure demolition was finalized on March 14, 2006 when the boiler building and its contents were demolished.

- CRA/Brandenburg initiated U.S. EPA approved subsurface investigative measures, based on review of test pit and Geo-Probe sampling conducted as apart of the 2001 Weston Site Assessment, on March 20, 2006. To date, the contractor has completed the initial sampling and visual extent of contamination excavations. As a result, numerous stockpiles of paint waste and other contaminated soils are located; under plastic; throughout the property.
- Three additional overburden samples were conducted around the remaining horizontal AST identified as Tank G5. These locations were identified as GA, GB, and GC respectively.
- Waste excavation to a maximum depth of 5 feet continues throughout several areas of the facility based on current and bending analytical results.

Planned Removal Actions

B. Planned Activities

- Product removal, decommissioning, and scrap metal disposal of the three remaining above ground storage tanks is expected during April 2006.
- Off-site disposal of the remaining 55-gallon and over-pack drums staged throughout the former process facility footprint is planned during April 2006.
- Off-site disposal of the concrete debris generated during the above ground tank decommissioning is projected during April 2006.
- Continuing sampling and excavation of impacted soils discovered during the 2001 Site Assessment Report conducted by Weston and as directed by the OSC.

Next Steps

- Drummed and bulk product off-site disposal.
- Test pit and excavation removal of observed contamination for off-site disposal.

Key Issues

OSC Turner and Mike Grant, Illinois Environmental Protection Agency (IEPA), were on-site March 28, 2006 to view the on-going shallow waste identification and excavation/stockpiling being performed by the PRP's contractors. Fernando Carou, of Magna/PRPGroup, as well as the project and site manager for CRA were also present during the site reconnaissance.

Multiple excavations ranging in depths from three to five feet were observed to have remaining contamination of an unknown characteristic or chemical origin. The OSC instructed the PRP representatives that the work plan will need to be re-opened to address the observed site conditions. In addition, the amended work plan should include provisions to effectively locate and quantify the remaining subsurface contamination throughout the whole

facility footprint.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	\$16,250.00	\$21,952.01	(\$5,702.01)	-35.09%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$0.00	\$12,221.00	(\$12,221.00)	0.00%
Total Site Costs	\$16,250.00	\$34,173.01	(\$17,923.01)	-110.30%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

www.epaosc.net/ClaytonChemical-RRGSoilsRemoval